



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Implement the)
Commission's Procurement Incentive Framework)
and to Examine the Integration of Greenhouse)
Gas Emissions Standards into Procurement)
Policies.)

Rulemaking 06-04-009
(Filed April 13, 2006)

OPENING COMMENTS
OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON DRAFT WORKSHOP REPORT

FRANK J. COOLEY
ANNETTE GILLIAM

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4880
Facsimile: (626) 302-3990
E-mail: gilliaa@sce.com

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**POST-WORKSHOP COMMENTS OF
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
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ON DRAFT WORKSHOP REPORT

I.

INTRODUCTION

Pursuant to the Administrative Law Judge's Ruling on Phase 1 Post-Workshop Comments, Schedule, and Other Procedural Matters issued by Administrative Law Judge (ALJ) Meg Gottstein on July 7, 2006, and the extension of time granted by Acting Assistant Chief ALJ Janet Econome, dated August 28, 2006,¹ Southern California Edison Company (SCE) hereby submits its Opening Comments on the Draft Workshop Report (Opening Comments).

On August 21, 2006, Commission Workshop Staff issued a Workshop Report entitled, "Draft Interim Emissions Performance Standard Program Framework" (Workshop Report) summarizing the three-day workshop conducted by the California Public Utilities Commission (Commission) in this climate change policy proceeding on June 21-23, 2006 in San Francisco. During this workshop, parties and staff considered the design and implementation structure of an interim emissions performance standard (EPS) program prior to implementation of a greenhouse

¹ PG&E requested an extension of time in an email dated August 25, 2006, on behalf of several parties. Acting Assistant Chief ALJ Econome extended the date for filing Opening Comments from September 1 to September 8, 2006, and for filing Reply Comments from September 12 to September 15, 2006.

gas (GHG) cap that would apply to the three major investor-owned electric utilities (IOUs),² jurisdictional energy service providers, and community choice aggregators that operate within an IOU's territory.

In the Workshop Report, Commission Staff outlines the background and purpose of the workshops, reviews participants' comments on key points, summarizes the advantages and disadvantages that participants attributed to key issues associated with an interim EPS program, and includes a revised version of the staff proposal for an EPS program. In Opening Comments, parties were directed to discuss their views on the Revised Staff Proposal, supporting their arguments with specific examples whenever possible, and not to repeat comments or previous arguments submitted in this phase of the proceeding.³

Since the Workshop Report was issued, however, the California Legislature passed Senate Bill (SB) 1368 on August 31, 2006.⁴ Governor Schwarzenegger is unlikely to veto this bill. Thus, the bill will likely become law in the near future. When it does become law, the Commission will have to follow the legislative requirements in SB 1368. As such, the Commission should modify the schedule in this proceeding to allow for reconciliation of the Revised Staff Proposal with the provisions of SB 1368. SCE recommends that the Commission hold another workshop for the parties to discuss the changes that are required in the Revised Staff Proposal due to SB 1368, as well as to choose an appropriate EPS in consultation with the California Energy Commission (CEC) and the California State Air Resources Board (CARB).⁵ In these Opening Comments, SCE will identify certain areas that will require modification.

² The term "IOUs" refers collectively to Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and SCE, the utility respondents to the this proceeding.

³ Workshop Report, p. 42 of 81.

⁴ SB 1368 is an act to add Chapter 3 (commencing with Section 8340) to Division 4.1 of the Public Utilities Code, relating to electricity, introduced in the Senate by Senator Perata and coauthored by Assembly Member Levine.

⁵ Under SB 1368, the Commission will set the standard for its jurisdictional LSEs and the CEC will set the standard for local publicly owned electric utilities. New PUC Code Sections 8341(a).

II.

DISCUSSION

A. The Commission Must Re-Evaluate the Schedule and Goals of this Proceeding in Light of SB 1368 and AB 32.

SB 1368 resolves several issues that arose during the course of this proceeding. It provides direction to the Commission on the manner in which it should establish a GHG EPS and adds the following section to the Public Utilities Code:

8341(d) (1) On or before February 1, 2007, the commission, through a rulemaking proceeding, and in consultation with the Energy Commission and the State Air Resources Board, shall establish a greenhouse gases emission performance standard for all baseload generation of load-serving entities, at a rate of emissions of greenhouse gases that is no higher than the rate of emissions of greenhouse gases for combined-cycle natural gas baseload generation. Enforcement of the greenhouse gases emission performance standard shall begin immediately upon the establishment of the standard. All combined-cycle natural gas powerplants that are in operation, or that have an Energy Commission final permit decision to operate as of June 30, 2007, shall be deemed to be in compliance with the greenhouse gases emission performance standard.

(2) In determining the rate of emissions of greenhouse gases for baseload generation, the commission shall include the net emissions resulting from the production of electricity by the baseload generation.

(3) The commission shall establish an output-based methodology to ensure that the calculation of emissions of greenhouse gases for cogeneration recognizes the total usable energy output of the process, and includes all greenhouse gases emitted by the facility in the production of both electrical and thermal energy.

(4) In calculating the emissions of greenhouse gases by facilities generating electricity from biomass, biogas, or landfill gas energy, the commission shall consider net emissions from the process of growing, processing, and generating the electricity from the fuel source.

(5) Carbon dioxide that is injected in geological formations, so as to prevent releases into the atmosphere, in compliance with applicable laws and regulations shall not be counted as emissions of the powerplant in determining compliance with the greenhouse gases emissions performance standard.

(6) In adopting and implementing the greenhouse gases emission performance standard, the commission, in consultation with the Independent System Operator shall consider the effects of the standard on system reliability and overall costs to electricity customers.

(7) In developing and implementing the greenhouse gases emission performance standard, the commission shall address long-term purchases of electricity from unspecified sources in a manner consistent with this chapter.

(8) In developing and implementing the greenhouse gases emission performance standard, the commission shall consider and act in a manner consistent with any rules adopted pursuant to Section 824a-3 of Title 16 of the United States Code.

(9) An electrical corporation that provides electric service to 75,000 or fewer retail end-use customers in California may file with the commission a proposal for alternative compliance with this section, which the commission may accept upon a showing by the electrical corporation of both of the following:

(A) A majority of the electrical corporation's retail end-use customers for electric service are located outside of California.

(B) The emissions of greenhouse gases to generate electricity for the retail end-use customers of the electrical corporation are subject to a review by the utility regulatory commission of at least one other state in which the electrical corporation provides regulated retail electric service. [Emphasis added.]

SB 1368 covers the issues that constitute Phase I of this proceeding as defined in the Order Instituting Rulemaking 06-04-009.⁶ It resolves several issues that were debated in the Workshop and in briefs. For example, SB 1368 implements PUC Code section 8340(a), which defines “baseload,” “Long-term financial commitment,” and “powerplant”:

⁶ OIR.06-04-009, *mimeo*, pp. 9-10.

(a) "Baseload generation" means electricity generation from a powerplant that is designed and intended to provide electricity at an annualized plant capacity factor of at least 60 percent.⁷

(j) "Long-term financial commitment" means either a new ownership investment in baseload generation or a new or renewed contract with a term of five or more years, which includes procurement of baseload generation.⁸

(m) "Powerplant" means a facility for the generation of electricity, and includes one or more generating units at the same location.⁹

In addition to SB 1368, Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, was passed and sent to the Governor for signature on September 6, 2006.¹⁰ This law, among other things, will require CARB (i) to adopt regulations to require the reporting and verification of statewide GHG emissions, (ii) to monitor and enforce compliance with this program, and (iii) to adopt a statewide GHG emissions limit equivalent to the statewide GHG emissions levels in 1990 to be achieved by 2020. Thus, AB 32 covers the issues that are scheduled for Phase II of this proceeding – to develop a GHG emissions cap. Consequently, the Commission must re-evaluate the schedule and goals of this proceeding in light of both SB 1368 and AB 32.

B. The Commission Needs to Adopt an Appropriate EPS in Light of SB 1368 in Consultation With the CEC and the CARB.

SB 1368 enacts provisions of the PUC that will adopt an EPS for both Commission jurisdictional Load Serving Entities (LSEs) and CEC jurisdictional local publicly owned electric

⁷ Debate was held over the appropriate percentage to use.

⁸ Debate was held over the appropriate length of contract term to use and whether to include renewals of existing contracts.

⁹ Debate was held over whether each unit at a site was a separate powerplant or whether all the units at the site were considered one powerplant.

¹⁰ http://www.leginfo.ca.gov/pub/bill/asm/ab_0001-0050/ab_32_bill_20060906_status.html

utilities.¹¹ The EPS should be the same for LSEs and local publicly owned electric utilities. The Commission is directed by new PUC section 8341(d)(1) to consult with the CEC and the CARB in setting the EPS:

On or before February 1, 2007, the commission, through a rulemaking proceeding, and in consultation with the Energy Commission and the State Air Resources Board, shall establish a greenhouse gases emission performance standard for all baseload generation of load-serving entities, at a rate of emissions of greenhouse gases that is no higher than the rate of emissions of greenhouse gases for combined-cycle natural gas baseload generation. ... [Emphasis added.]

Similarly, new PUC section 8341(e)(1) directs the CEC to consult with the Commission and the CARB in setting the EPS for local publicly owned electric utilities.

In the Revised Staff Proposal, Commission Staff proposes an EPS of 1,000 lbs CO₂/MWh in Section 6(a):

6) What is the Standard and How Determined?

a) Emissions standards based upon CCGT performance at ISO levels.

One standard for all covered facilities: equal to a high-performing new CCGT as discussed in the data request. The standard limit is 1000 lbs CO₂/MWh.

The Commission should modify the EPS of 1,000 lbs CO₂/MWh set in the Revised Staff Proposal to be consistent with SB 1368. SB 1368 sets no specific limit for the EPS. Instead, it directs the Commission, in consultation with the CEC and the CARB, to conduct a rulemaking to determine the rate of emissions that is no higher than the rate of a combined-cycle natural gas baseload generator:

8341(d) (1) On or before February 1, 2007, the [C]ommission, through a rulemaking proceeding,

¹¹ PUC section 8341(a).

and in consultation with the Energy Commission and the State Air Resources Board, shall establish a greenhouse gases emission performance standard for all baseload generation of load-serving entities, at a rate of emissions of greenhouse gases that is no higher than the rate of emissions of greenhouse gases for combined-cycle natural gas baseload generation. Enforcement of the greenhouse gases emission performance standard shall begin immediately upon the establishment of the standard. All combined-cycle natural gas powerplants that are in operation, or that have an Energy Commission final permit decision to operate as of June 30, 2007, shall be deemed to be in compliance with the greenhouse gases emission performance standard. [Emphasis added.]

This provision provides that combined-cycle natural gas power plants that operate or have a final permit decision to operation as of June 30, 2007, will be deemed to comply with the GHG EPS. Unfortunately, other types of generation resources exist now and will exist on June 30, 2007, but will not be exempt from the EPS (*e.g.*, non-combined-cycle natural gas power plants and unspecified unit contracts from existing resources). All of these types of resources will likely have emissions higher than a new combined-cycle natural gas baseload generator, which appears to be the basis for the Revised Staff Proposal of 1,000 lbs CO₂/MWh. If the EPS is set too low, it will eliminate these types of facilities from operation.

SCE believes that the standard of 1,000 lbs CO₂/MWh is too low and could eliminate a significant amount of generation resources from being eligible to be procured by IOUs and other LSEs on a long-term basis. This number should be analyzed more fully in a workshop to discuss the redirection of this proceeding in light of SB 1368.

C. The Commission Should Provide for Exemptions for Significant Economic Impacts Caused by Application of the EPS, as Required by SB 1368.

The Commission Staff proposes reliability exemptions in Section 5(h) of the Revised Staff Proposal in the Draft Workshop Report:

5) Covered Power Sources

...

Reliability exemptions may be permitted, and will be considered on a case-by-case basis.

Exemptions should not be limited to reliability. Exemptions should also be considered on a case-by-case basis for significant economic impacts caused by applying the EPS. Thus, Section 5(h) does not go far enough. SB 1368 adopts PUC Code section 8341(d)(6), which should form the basis of an exemption to the performance standard:

(6) In adopting and implementing the greenhouse gases emission performance standard, the commission, in consultation with the Independent System Operator shall consider the effects of the standard on system reliability and overall costs to electricity customers. [Emphasis added.]

Thus, SB 1368 would not limit potential exemptions to reliability. SB 1368 goes further. Exemptions should also be considered on a case-by-case basis for significant economic impacts caused by applying the EPS. Thus, Section 5(h) of the Revised Staff Proposal should be amended as follows:

5) Covered Power Sources

...

h) Exemptions may be permitted on a case-by-case basis, such as for system reliability concerns and considering overall costs to electricity customers.

D. The Application of the Standard to Units and Contracts Needs Clarification in Light of SB 1368.

The Commission Staff proposes a standard in Section 7(e) of the Revised Staff Proposal in the Draft Workshop Report:

7) Application of the standard to units and contracts

...

e) Unspecified resource contracts: apply CEC “Net System Power” average. This is the statewide system average of the leftover energy in the system that is not claimed- includes in and out of state power, and anything that is not claimed by a CA utility, and is the most representative option reflecting CA LSE procurement activities. All LSEs would use the same average emissions factor, regardless of location in the state.

SB 1368 addresses unspecified resource contracts in its addition of Public Utilities Code Section 8341(d)(7):

In developing and implementing the greenhouse gases emission performance standard, the commission shall address long-term purchases of electricity from unspecified sources in a manner consistent with this chapter.

The CEC “Net System Power” average does not accurately reflect potential generation resources underlying unspecified resource contracts. No relationship exists between the leftover energy in the system used to calculate the Net System Power and unspecified purchase contracts. By its very definition, Net System Power is the CEC’s calculation that approximates the mix of “leftover” or unaccounted for energy in the system. However, energy contracts without an up-front specified source are common transactions in the energy market today. These transactions eventually result in energy being delivered to the system from specific sources, which generally become known to the buyer and to the California Independent System Operator (ISO) at the time of delivery, or from neighboring electrical systems. To consider these transactions as “unaccounted for energy” is inappropriate. Thus, the Revised Staff Proposal effectively compares apples to oranges.

If the Commission does decide to use Net System Power to determine the carbon intensity for unspecified resource contracts then it should at least adopt a higher and more accommodative performance standard so as to not eliminate all long-term unspecified resource contracts from an IOU’s resource mix.

The Commission should recognize that non-unit-specific contracts are an essential part of the hybrid market structure today and are critical in hedging the energy cost exposure to the IOUs' ratepayers. The Commission should neither preclude non-unit-specific contracts from being an integral part of an IOU's portfolio, nor create artificial and costly programs just for the sake of creating an illusion of due process.

III.

CONCLUSION

SCE respectfully submits its Opening Comments on the Draft Workshop Report.

Respectfully submitted,

FRANK J. COOLEY
ANNETTE GILLIAM

/s/ ANNETTE GILLIAM

By: Annette Gilliam

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4880
Facsimile: (626) 302-3990
E-mail: gilliaa@sce.com

September 8, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON DRAFT WORKSHOP REPORT on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **8th day of September, 2006**, at Rosemead, California.

/s/ RAQUEL IPPOLITI

Raquel Ippoliti
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Ave.
Post Office Box 800
Rosemead, California 91770

R.06-04-009

Friday, September 8, 2006

CASE ADMINISTRATION
CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD, CA 91770
R.06-04-009

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94114
R.06-04-009

MAHLON ALDRIDGE
ECOLOGY ACTION, INC.
PO BOX 1188
SANTA CRUZ, CA 95060
R.06-04-009

JASMIN ANSAR
PG&E
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

E. JESUS ARREDONDO
DIRECTOR, REGULATORY AND
GOVERNMENTAL
NRG ENERGY, INC.
4600 CARLSBAD BLVD.
CARLSBAD, CA 99208
R.06-04-009

CURT BARRY
717 K STREET, SUITE 503
SACRAMENTO, CA 95814
R.06-04-009

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710
R.06-04-009

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.06-04-009

CLARK BERNIER
RLW ANALYTICS
1055 BROADWAY, SUITE G
SONOMA, CA 95476
R.06-04-009

GREG BLUE
140 MOUNTAIN PKWY.
CLAYTON, CA 94517
R.06-04-009

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA, LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, TX 77002
R.06-04-009

KAREN BOWEN
ATTORNEY AT LAW
WHITE & CASE, LLP
4 EMBARCADERO CENTER, 24th FLOOR
SAN FRANCISCO, CA 94111
R.06-04-009

DAVID BRANCHCOMB
BRANCHCOMB ASSOCIATES, LLC
9360 OAKTREE LANE
ORANGEVILLE, CA 95662
R.06-04-009

DONALD BROOKHYSER
ATTORNEY AT LAW
ALCANTAR & KAHL
120 MONTGOMERY STREET
Cogeneration Association of California
SAN FRANCISCO, CA 94104
R.06-04-009

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.06-04-009

VERONIQUE BUGNION
POINT CARBON
205 SEVERN RIVER RD
SEVERNA PARK, MD 21146
R.06-04-009

DALLAS BURTRAW
1616 P STREET, NW
WASHINGTON, DC 20036
R.06-04-009

OLOF BYSTROM
DIRECTOR, WESTERN ENERGY
CAMBRIDGE ENERGY RESEARCH
ASSOCIATES
555 CALIFORNIA STREET, 3RD FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

R.06-04-009

Friday, September 8, 2006

IAN CARTER
INTERNATIONAL EMISSIONS TRADING
ASSN.
350 SPARKS STREET, STE. 809
OTTAWA, ON K1R 7S8
CANADA
R.06-04-009

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

Theresa Cho
ATTORNEY AT LAW
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
R.06-04-009

JENNIFER CHAMBERLIN
STRATEGIC ENERGY
2633 WELLINGTON CT.
CLYDE, CA 94520
R.06-04-009

AUDREY CHANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

DAREN CHAN
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.06-04-009

BILL CHEN
CONSTELLATION NEWENERGY, INC.
2175 N. CALIFORNIA BLVD., SUITE 300
WALNUT CREEK, CA 94596
R.06-04-009

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94704
R.06-04-009

BRIAN K. CHERRY
REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 B10C
SAN FRANCISCO, CA 94177--0001
R.06-04-009

ALAN COMNES
WEST COAST POWER
3934 SE ASH STREET
PORTLAND, OR 97214
R.06-04-009

LISA A. COTTLE
ATTORNEY AT LAW
WINSTON & STRAWN, LLP
101 CALIFORNIA STREET, SUITE 3900
SAN FRANCISCO, CA 94111-5894
R.06-04-009

RICHARD COWART
REGULATORY ASSISTANCE PROJECT
50 STATE STREET, SUITE 3
MONTPELIER, VT 5602
R.06-04-009

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY
LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-04-009

SEBASTIEN CSAPO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

THOMAS DARTON
PILOT POWER GROUP, INC.
9320 CHESAPEAKE DRIVE, SUITE 112
SAN DIEGO, CA 92123
R.06-04-009

KYLE L. DAVIS
PACIFICORP
825 NE MULTNOMAH,
PORTLAND, OR 97232
R.06-04-009

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.06-04-009

LISA DECARLO
STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-14
SACRAMENTO, CA 95814
R.06-04-009

R.06-04-009

Friday, September 8, 2006

LISA DECKER
COUNSEL
CONSTELLATION ENERGY GROUP INC
111 MARKET PLACE, SUITE 500
BALTIMORE, MD 21202
R.06-04-009

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737
R.06-04-009

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
R.06-04-009

PIERRE H. DUVAIR
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-41
SACRAMENTO, CA 95814
R.06-04-009

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA, CA 90401
R.06-04-009

SHAUN ELLIS
2183 UNION STREET
SAN FRANCISCO, CA 94123
R.06-04-009

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY
COMMISSION
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630
R.06-04-009

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.06-04-009

Julie A Fitch
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION ROOM 5203
SAN FRANCISCO, CA 94102-3214
R.06-04-009

MICHEL PETER FLORIO
SENIOR ATTORNEY
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

JONATHAN FORRESTER
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STYREET, ROOM 1373A
SAN FRANCISCO, CA 94105
R.06-04-009

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

NORMAN J. FURUTA
ATTORNEY AT LAW
DEPARTMENT OF THE NAVY
333 MARKET ST. 10TH FLOOR
SAN FRANCISCO, CA 94105-2195
R.06-04-009

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
R.06-04-009

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814
R.06-04-009

ANNETTE GILLIAM
SCE LAW DEPARTMENT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-04-009

HAYLEY GOODSON
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

MEG GOTTSTEIN
ADMINISTRATIVE LAW JUDGE
CALIF PUBLIC UTILITIES COMMISSION
PO BOX 210/21496 NATIONAL STREET
VOLCANO, CA 95689
R.06-04-009

R.06-04-009

Friday, September 8, 2006

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET
SAN FRANCISCO, CA 94111-6533
R.06-04-009

KAREN GRIFFIN
EXECUTIVE OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 39
SACRAMENTO, CA 95814
R.06-04-009

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
101 CALIFORNIA STREET, 41ST FLOOR
Center for Energy and Economic Development
SAN FRANCISCO, CA 94111
R.06-04-009

YVONNE GROSS
REGULATORY POLICY MANAGER
SEMPRA ENERGY
101 ASH STREET, HQ08C
SAN DIEGO, CA 92101
R.06-04-009

ERIC GUIDRY
WESTERN RESOURCE ADVOCATES
2260 BASELINE ROAD, SUITE 200
BOULDER, CO 80304
R.06-04-009

GEORGE HANSON
ASSISTANT GENERAL MANAGER
CITY OF CORONA
730 CORPORATION YARD WAY
CORONA, CA 92880
R.06-04-009

ARNO HARRIS
PO BOX 6903
SAN RAFAEL, CA 94903
R.06-04-009

HANK HARRIS
CORAL POWER, LLC
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121
R.06-04-009

AUDRA HARTMANN
LS POWER DEVELOPMENT
980 NINTH STREET, SUITE 1420
SACRAMENTO, CA 95814
R.06-04-009

KERRY HATTEVIK
MIRANT CORPORATION
696 WEST 10TH STREET
PITTSBURG, CA 94565
R.06-04-009

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

TIM HEMIG
DIRECTOR
REGIONAL ENVIRONMENTAL BUSINESS
NRG ENER
4600 CARLSBAD BLVD.
CARLSBAD, CA 92008
R.06-04-009

DENISE HILL
DIRECTOR
4004 KRUSE WAY PLACE, SUITE 150
LAKE OSWEGO, OR 97035
R.06-04-009

NATALIE L HOCKEN
SENIOR COUNSEL
PACIFICORP
825 NE MULTNOMAH SUITE 1800
PORTLAND, OR 97232
R.06-04-009

ANDREW HOERNER
REDEFINING PROGRESS
1904 FRANKLIN STREET, 6TH FLOOR
OAKLAND, CA 94612
R.06-04-009

JUDITH IKLE
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE RM 4012
SAN FRANCISCO, CA 94102
R.06-04-009

AKBAR JAZAYERI
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-04-009

CAROL JOLLY
PO BOX 585
CHESTERFIELD, MA 1012
R.06-04-009

R.06-04-009

Friday, September 8, 2006

BRIAN M. JONES
M.J. BRADLEY & ASSOCIATES, INC.
47 JUNCTION SQUARE DRIVE
CONCORD, MA 1742
R.06-04-009

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
R.06-04-009

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.06-04-009

JOSEPH KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94104-1513
R.06-04-009

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067
R.06-04-009

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208
R.06-04-009

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814-3947
R.06-04-009

GREGORY S.G. KLATT
DOUGLASS & LIDDELL
Alliance for Retail Energy Markets
21700 OXNARD STREET, SUITE 1030
WOODLAND, CA 91367-8102
R.06-04-009

GREGORY KOISER
CONSTELLATION NEW ENERGY, INC.
350 SOUTH GRAND AVENUE, SUITE 3800
LOS ANGELES, CA 90071
R.06-04-009

AVIS KOWALEWSKI
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
R.06-04-009

LARS KVALE
CENTER FOR RESOURCE SOLUTIONS
PO BOX 39512
SAN FRANCISCO, CA 94129
R.06-04-009

Jonathan Lakritz
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5202
SAN FRANCISCO, CA 94102-3214
R.06-04-009

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B8R
SAN FRANCISCO, CA 94105
R.06-04-009

SHAY LABRAY
MANAGER, REGULATORY
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
PORTLAND, OR 97232
R.06-04-009

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
SAN DIEGO, CA 92106
R.06-04-009

Diana L. Lee
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
R.06-04-009

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS,
LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130
R.06-04-009

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.06-04-009

R.06-04-009

Friday, September 8, 2006

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB119
CMTA
ANTELOPE, CA 95843
R.06-04-009

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.06-04-009

James Loewen
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013
R.06-04-009

BILL LOCKYER
STATE ATTORNEY GENERAL
STATE OF CALIFORNIA, DEPT OF JUSTICE
PO BOX 944255
SACRAMENTO, CA 94244-2550
R.06-04-009

LAD LORENZ
V.P. REGULATORY AFFAIRS
SOUTHERN CALIFORNIA GAS COMPANY
601 VAN NEW AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102
R.06-04-009

BARRY LOVELL
BERRY PETROLEUM COMPANY
PO BOX 925
PO BOX 925
TAFT, CA 93268
R.06-04-009

ED LUCHA
PROJECT COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B9A
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

FRANK LUCHETTI
NEVADA DIV. OF ENVIRONMENTAL
PROTECTION
901 S. STEWART ST., SUITE 4001
CARSON CITY, NV 89701
R.06-04-009

LYNELLE LUND
GENERAL COUNSEL
COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA, CA 92626
R.06-04-009

MARY LYNCH
REGULATORY AND LEGISLATIVE AFFAIRS
CONSTELLATION ENERGY COMMODITIES
GROUP
2377 GOLD MEADOW WAY, STE. 100
GOLD RIVER, CA 95670
R.06-04-009

JACLYN MARKS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVE.
DIVISION OF STRATEGIC PLANNING
SAN FRANCISCO, CA 94102
R.06-04-009

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.06-04-009

MICHAEL MAZUR
3 PHASES ELECTRICAL CONSULTING
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266
R.06-04-009

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616
R.06-04-009

BARRY F MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.06-04-009

MIKE MCCORMICK
CALIFORNIA CLIMATE ACTION REGISTRY
515 S FLOWER ST. 1305
LOS ANGELES, CA 90071
R.06-04-009

KEITH R. MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
California Manufacturers & Technology
Association
WASHINGTON, DC 20004-2415
R.06-04-009

KAREN MCDONALD
POWEREX CORPORATION
666 BURRAND STREET
VANCOUVER, BC V6C 2X8
CANADA
R.06-04-009

R.06-04-009

Friday, September 8, 2006

JEN MCGRAW
CENTER FOR NEIGHBORHOOD
TECHNOLOGY
PO BOX 14322
SAN FRANCISCO, CA 94114
R.06-04-009

BRUCE MCLAUGHLIN
BRAUN & BLAISING P.C.
8066 GARRYANNA DRIVE
CITRUS HEIGHTS, CA 95610
R.06-04-009

BRIAN MCQUOWN
RELIANT ENERGY
7251 AMIGO ST., SUITE 120
LAS VEGAS, NV 89119
R.06-04-009

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
R.06-04-009

CYNTHIA K. MITCHELL
ECONOMIC CONSULTING INC.
530 COLGATE COURT
RENO, NV 89503
R.06-04-009

Lainie Motamedi
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5119
SAN FRANCISCO, CA 94102-3214
R.06-04-009

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
R.06-04-009

STEVEN MOSS
FRANCISCO COMMUNITY POWER
COOPERATIVE
2325 3RD STREET, STE 344
SAN FRANCISCO, CA 94120
R.06-04-009

PHILLIP J. MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903
R.06-04-009

CLYDE S. MURLEY
INDEPENDENT CONSULTANT
600 SAN CARLOS AVENUE
ALBANY, CA 94706
R.06-04-009

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
R.06-04-009

RICK NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
R.06-04-009

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
Center for Energy and Economic Development
DENVER, CO 80202
R.06-04-009

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060
R.06-04-009

ROGER PELOTE
WILLIAMS POWER COMPANY, INC.
12736 CALIFA STREET
VALLEY VILLAGE, CA 91607
R.06-04-009

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
418 BENVENUE AVENUE
LOS ALTOS, CA 94024
R.06-04-009

CARLA PETERMAN
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.06-04-009

EDWARD G. POOLE
ATTORNEY AT LAW
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2818
R.06-04-009

R.06-04-009

Friday, September 8, 2006

KELLY POTTER
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85260
R.06-04-009

BRIAN POTTS
ONE SOUTH PINCKNEY STREET
MADISON, WI 53703
R.06-04-009

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, ML 14D6
LOS ANGELES, CA 90013
R.06-04-009

BALWANT S. PUREWAL
DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821
R.06-04-009

ADRIAN PYE
ENERGY AMERICA, LLC
263 TRESSER BLVD.
STAMFORD, CT 6901
R.06-04-009

Kristin Ralff Douglas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5119
SAN FRANCISCO, CA 94102-3214
R.06-04-009

STEVE RAHON
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548
R.06-04-009

JANILL RICHARDS
DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S
OFFICE
1515 CLAY STREET, 20TH FLOOR
OAKLAND, CA 94702
R.06-04-009

Grant Rosenblum
STAFF COUNSEL
ELECTRICITY OVERSIGHT BOARD
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.06-04-009

THEODORE ROBERTS
SEMPRA ENERGY
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101-3017
R.06-04-009

JAMES ROSS
REGULATORY & COGENERATION
SERVICES, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.06-04-009

Nancy Ryan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5217
SAN FRANCISCO, CA 94102-3214
R.06-04-009

SAM SADLER
OREGON DEPARTMENT OF ENERGY
625 NE MARION STREET
SALEM, OR 97301-3737
R.06-04-009

SOUMYA SASTRY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
RM. SCTO
SACRAMENTO, CA 95814
R.06-04-009

JANINE L. SCANCARELLI
FOLGER LEVIN & KAHN LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111
R.06-04-009

STEVEN S. SCHLEIMER
DIR. OF MARKET & REGULATORY AFFAIRS
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PO BOX 11749
PLEASANTON, CA 94588-1749
R.06-04-009

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
California City-County Street Light Assoc.
BERKELEY, CA 94703-2714
R.06-04-009

R.06-04-009

Friday, September 8, 2006

LISA SCHWARTZ
SENIOR ANALYST
ORGEON PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM, OR 97308-2148
R.06-04-009

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
DENVER, CO 80202
R.06-04-009

KEVIN SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301
R.06-04-009

Donald R Smith
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.06-04-009

AIMEE M. SMITH
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101
R.06-04-009

GLORIA D. SMITH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
R.06-04-009

RICHARD SMITH
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060
R.06-04-009

DARRELL SOYARS
MANAGER-RESOURCE
PERMITTING&STRATEGIC
6100 NEIL ROAD
RENO, NV 89520-0024
R.06-04-009

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY
LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-04-009

SEEMA SRINIVASAN
ALCANTAR & KAHL
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.06-04-009

ANNIE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97210
R.06-04-009

MERIDETH TIRPAK STERKEL
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.06-04-009

DON STONBERGER
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
R.06-04-009

NINA SUETAKE
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE 350
SAN FRANCISCO, CA 94102
R.06-04-009

ADRIAN E. SULLIVAN
SEMPRA ENERGY
101 ASH STREET, HQ13D
SAN DIEGO, CA 92101
R.06-04-009

KENNY SWAIN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060
R.06-04-009

Christine S Tam
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.06-04-009

KAREN TERRANOVA
ALCANTAR & KAHL
120 MONTGOMERY STREET SUITE 2200
SAN FRANCISCO, CA 94104
R.06-04-009

R.06-04-009

Friday, September 8, 2006

EDWARD J TIEDEMANN
KRONICK, MOSKOVITZ, TIEDEMANN &
GIRARD
400 CAPITOL MALL, 27TH FLOOR
SACRAMENTO, CA 95814-4416
R.06-04-009

SCOTT TOMASHEFSKY
REGULATORY AFFAIRS MANAGER
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
NORTHERN CALIFORNIA POWER AGENCY
ROSEVILLE, CA 95678
R.06-04-009

MARK C TREXLER
TREXLER CLIMATE+ENERGY SERVICES,
INC.
529 SE GRAND AVE,M SUITE 300
PORTLAND, OR 97214-2232-2232
R.06-04-009

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563
R.06-04-009

EDWARD VINE
LAWRENCE BERKELEY NATIONA LAB
BUILDING 90-4000
BERKELEY, CA 94720
R.06-04-009

SYMONE VONGDEUANE
SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017
R.06-04-009

DEVRA WANG
STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

CHRISTOPHER J. WARNER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
R.06-04-009

JOY WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.06-04-009

LISA WEINZIMER
CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
R.06-04-009

ANDREA WELLER
DIRECTOR
STRATEGIC ENERGY LLC
3130 D BALFOUR ROAD, SUITE 290
BRENTWOOD, CA 94513
R.06-04-009

GREGGORY L. WHEATLAND
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95814
R.06-04-009

JOSEPH F. WIEDMAN
GOODIN MACBRIDE SQUERI RITCHIE &
DAY,LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-04-009

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105
R.06-04-009

RYAN WISER
BERKELEY LAB
ONE CYCLOTRON ROAD
BERKELEY, CA 94720
R.06-04-009

ELLEN WOLFE
RESERO CONSULTING
9289 SHADOW BROOK PL.
GRANITE BAY, CA 95746
R.06-04-009

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS
COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801
R.06-04-009

LINDA WRAZEN
SEMPRA ENERGY REGULATORY AFFAIRS
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101
R.06-04-009

R.06-04-009

Friday, September 8, 2006

E. J. WRIGHT
OCCIDENTIAL ENERGY MARKETING, INC.
5 GREENWAY PLAZA, SUITE 110
HOUSTON, TX 77046
R.06-04-009

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.06-04-009

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431
R.06-04-009

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, STE 1440
OAKLAND, CA 94612-3517
R.06-04-009